

Exhibit 3

Highly Confidential - Outside Counsel Eyes Only

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

HYDRAFACIAL LLC, formerly known as
EDGE SYSTEMS LLC,

Plaintiff,

v.

LUVO MEDICAL TECHNOLOGIES, INC.,
CLARION MEDICAL TECHNOLOGIES,
INC., EUNSUNG GLOBAL CORP., and
HEALTHCARE MARKETS, INC. doing
business as POWERED BY MRP,

Defendants.

**DEFENDANT EUNSUNG GLOBAL
CORP'S RESPONSES TO
HYDRAFACIAL LLC'S FIRST SET OF
INTERROGATORIES (NOS. 1-9)**

Case No. 2:24-cv-00587-TC-JCB

Judge: Hon. Tena Campbell
Judge: Hon. Jared C. Bennett

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure Defendant Eunsung Global Corp. (“Eunsung” or “Defendant”) hereby responds to Plaintiff HydraFacial LLC f/k/a Edge Systems, LLC (“HydraFacial” or “Plaintiff”) First Set of Interrogatories (Nos. 1-9).

GENERAL STATEMENTS AND OBJECTIONS

The following objections are hereby incorporated into each and every response to HydraFacial’s First Set of Interrogatories. The information set forth below is true and correct to the best of Eunsung’s knowledge as of the date of the objection and/or response, and is subject to correction for inadvertent errors, mistakes, or omissions, if any should be found to exist. These objections and/or responses are based upon records and information presently available to Eunsung, and Eunsung’s investigation of facts and discovery of information and documents relating to the claims and defenses at issue in this case is ongoing. Eunsung reserves the right to supplement these objections and/or responses with—and to introduce at trial or in any pretrial motion in this case—any and all evidence hereafter discovered by the parties in this action, including evidence from any third party.

Nothing in these responses and objections shall be deemed an admission by Eunsung regarding the propriety of this lawsuit, or the existence of any information, the relevance, authenticity, materiality or admissibility of any information, for any purpose, or the truth or accuracy of any statement or characterization contained in any Interrogatory. Where Eunsung responds by identifying documents or individuals with knowledge concerning a particular subject matter identified in an Interrogatory, such response shall not be construed as an admission concerning the accuracy of HydraFacial’s characterization of the subject matter. Eunsung expressly reserves the right to object to the use of these responses, the subject matter contained

herein, or the documents produced in connection herewith during any subsequent proceeding, including during trial of this or any other action.

Eunsung makes the following General Objections to the Interrogatories as a whole and to each and every separate interrogatory, whether or not separately set forth in each response to each interrogatory.

1. Eunsung objects to each and every Interrogatory to the extent it is duplicative, cumulative, compound, or contains multiple subparts in violation of Fed. R. Civ. P. 33. Such Interrogatories constitute separate requests that count toward the limit on Interrogatories that Hydrafacial is permitted to propound. Eunsung objects the Interrogatories to the extent they exceed the permissible number, including all parts and subparts.

2. Eunsung objects to each and every Interrogatory, Definition, and Instruction to the extent it seeks information or documents protected by any applicable privilege, including but not limited to the attorney-client privilege, the work-product doctrine or immunity, common interest privilege, and any other applicable privilege, immunity, or exemption from discovery as outlined in the Federal Rules of Civil Procedure, Local Rules, orders of the Court, and applicable law. For the sake of clarity, Eunsung hereby asserts such privileges and/or exemptions. Any inadvertent disclosure or production of information and/or documents shall not be deemed a waiver of any applicable privilege, immunity, or protection.

3. Eunsung objects to each and every Interrogatory, Definition, and Instruction to the extent it seeks information or documents not relevant to the claims or defenses of any party, not proportional to the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties' relative access to relevant information, the parties'

resources, the importance of the discovery in resolving the issues, and whether the burden or expense of the proposed discovery outweighs its likely benefit.

4. Eunsung objects to each and every Interrogatory, Definition, and Instruction to the extent it seeks information or documents not reasonably calculated to lead to the discovery of admissible evidence or otherwise not within the scope of relevant discovery.

5. Eunsung objects to each and every Interrogatory, Definition, and Instruction to the extent it seeks information that Eunsung is under an obligation to third parties not to disclose, or information otherwise subject to confidentiality restrictions of a third party. Eunsung will not disclose or produce such information except in conformity with Eunsung's obligations to such third parties, and consistent with the Protective Order entered in this action.

6. Eunsung objects to each and every Interrogatory to the extent that it requests information that is a matter of public record, the burden for obtaining which is substantially the same for Eunsung as it is for Hydrafacial, that is otherwise equally available to Hydrafacial and/or equally obtainable from more convenient sources, or that purports to impose upon Eunsung a burden or obligation beyond the duties imposed by the Federal Rules of Civil Procedure or other applicable rules or law governing this action.

7. Eunsung objects to each and every Interrogatory, Definition, and Instruction to the extent it is overly broad, unduly burdensome, oppressive, harassing, incomprehensible, or constitutes an abuse of process, particularly when the cost necessary to investigate or respond is high compared to Hydrafacial's need for the information.

8. Eunsung objects to each and every Interrogatory to the extent that it is cumulative and duplicative of other forms of discovery that are more convenient and less burdensome. Service of duplicative requests squanders the parties' time and resources and creates an undue burden on

Eunsung in preparing responses. Eunsung further objects to each Interrogatory to the extent that it seeks to require Eunsung to do more than conduct an examination of those files or sources that reasonably may be expected to yield responsive information, or to inquire of those persons who may be reasonably expected to possess responsive information.

9. Consistent with Fed. R. Civ. P. 33(d), Eunsung objects to providing narrative responses to the Interrogatories where the information sought can be derived from documents and/or source code produced by Eunsung, and where the burden to derive such information from those documents is substantially the same for Hydrafacial as it is for Eunsung.

10. Eunsung objects to each and every Interrogatory, Definition, and Instruction to the extent it is inconsistent with or seeks to impose obligations beyond those imposed by the Federal Rules of Civil Procedure, Local Rules, Judge Campbell's Patent Rules, or orders of the Court.

11. Eunsung objects to each and every Interrogatory, Definition, and Instruction to the extent it is inconsistent with or seeks to impose obligations beyond those imposed by the Federal Rules of Civil Procedure, Local Rules, or orders of the Court.

12. Eunsung objects to each and every Interrogatory to the extent it uses terms that are not defined or understood. Eunsung will not speculate as to the meaning ascribed to such terms and will respond to the extent it understands such requests.

13. Eunsung objects to each and every Interrogatory to the extent it seeks legal opinions or conclusions, or presents questions of pure law. Any response by Eunsung shall not be construed as providing a legal conclusion regarding the meaning or application of any terms or phrases used in Hydrafacial's Interrogatories.

14. Eunsung objects to the definition of "Defendant," "Eunsung," "You," and "Your" as overly broad, unduly burdensome, and not proportional to the needs of the case to the extent it

purports to include entities or individuals other than Eunsung. Eunsung responds solely on behalf of solely, and does not respond on behalf of “any predecessor, predecessor-in-interest, successor, subsidiary, affiliate, and/or division,” or “any past or present principal, officer, director, employee, former employee, servant, agency, attorney, or other representative.”

15. Eunsung objects to the definition of “Accused Products” as overly broad, unduly burdensome, and not proportional to the needs of the case to the extent it purports to include any products not identified in the operative complaint in this case, and/or any current or future infringement contentions, including any amendments or supplements thereto.

16. Eunsung objects to the definition of “person,” “individual,” and “entity” as overly broad, unduly burdensome, and not proportional to the needs of the case to the extent it purports to impose a burden that is inconsistent with or beyond that imposed by the Federal Rules of Civil Procedure, the Court’s Local Rules, any applicable court order, and/or any stipulation or agreement between the parties.

17. Eunsung objects to the definition of “foreign” as overly broad, unduly burdensome, and not proportional to the needs of the case to the extent it purports to identify any “person, individual, or other entity” who simply “conducts business outside the United States” as a “foreign” individual or entity.

18. Eunsung objects to the definition of “document” as overly broad, unduly burdensome, and not proportional to the needs of the case to the extent it purports to impose a burden that is inconsistent with or beyond that imposed by the Federal Rules of Civil Procedure, the Court’s Local Rules, any applicable court order, and/or any stipulation or agreement between the parties.

19. Eunsung objects to the definition of “thing” as overly broad, unduly burdensome, and not proportional to the needs of the case to the extent it purports to impose a burden that is inconsistent with or beyond that imposed by the Federal Rules of Civil Procedure, the Court’s Local Rules, any applicable court order, and/or any stipulation or agreement between the parties.

20. Eunsung objects to the definition of “communication” as overly broad, unduly burdensome, and not proportional to the needs of the case to the extent it purports to impose a burden that is inconsistent with or beyond that imposed by the Federal Rules of Civil Procedure, the Court’s Local Rules, any applicable court order, and/or any stipulation or agreement between the parties. Eunsung additionally objects to the definition of “communication” to the extent it purports to impose an obligation to produce email or text message communications in the absence of an applicable ESI order or agreement between the parties.

21. Eunsung objects to the definition of “Infringement” to the extent it calls for a legal conclusion.

22. Eunsung objects to the definition of “Hydrodermabrasion Product” as overly broad, unduly burdensome, and not proportional to the needs of the case to the extent it purports to impose a burden that is inconsistent with or beyond that imposed by the Federal Rules of Civil Procedure, the Court’s Local Rules, any applicable court order, and/or any stipulation or agreement between the parties. Eunsung additionally objects to the definition of “Hydrodermabrasion Product” to the extent it calls for a legal conclusion.

SPECIFIC OBJECTIONS AND RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1:

Identify each Hydrodermabrasion Product, separately by release, version, brand name, internal or project name, part number, model name, design number, SKU code, and any other identifying means, that is, has been, or is intended to be imported, sold for importation into the United States, and/or sold in the United States by You or any third party, and identify the three (3)

individuals at Eunsung most knowledgeable about its design, structure, composition, function, and operation.

RESPONSE TO INTERROGATORY NO. 1

Eunsung restates and incorporates its General Objections as if fully set forth herein. Eunsung objects to this Interrogatory to the extent it seeks information not kept in the ordinary course of Eunsung's business. Eunsung objects to this Interrogatory as seeking information that is not relevant to any claim or defense of any party, and is not reasonably calculated to lead to the discovery of admissible evidence. Eunsung objects to this Interrogatory as overly broad, unduly burdensome, and not proportional to the needs of this case to the extent it seeks identification by "release, version, brand name, internal or project name, part number, model name, design number, SKU code, and any other identifying means," of "each Hydrodermabrasion Product . . . that is, has been, or is intended to be imported, sold for importation into the United States, and/or sold in the United States." Eunsung objects to this Interrogatory to the extent it seeks information or documents that is a matter of public record, that is equally available to Hydrafacial, and/or equally obtainable from more convenient sources. Eunsung objects to this Interrogatory as vague, ambiguous, and inherently arbitrary to the extent it seeks "three (3) individuals at Eunsung most knowledgeable." Eunsung objects to this Interrogatory as overly broad, unduly burdensome, and seeking information not proportional to the needs of the case, to the extent it seeks the identification of persons "most knowledgeable," which is not information known to be kept in the ordinary course of business. Eunsung objects to this Interrogatory as compound and comprising multiple subparts that seek information about discrete subjects, and therefore constitutes multiple Interrogatories. Eunsung objects to this Interrogatory as overly broad, unduly burdensome, vague, and not proportional to the needs of the case because it is not properly limited in time.

Subject to and without waiving the foregoing General and Specific Objections, Eunsung responds as follows:

Eunsung identifies the products listed in Appendix A to these Interrogatories as responsive to this Interrogatory.

Eunsung identifies the following individuals having knowledge related to the Accused Products:

- In Gun Joung (Electrical Features)
- GyeongJong Jang (Mechanical Features)
- Oh Kwon Kim (Software Features)

Investigation and discovery are ongoing in this case. These responses are based upon information currently available to Eunsung and are made without prejudice to Eunsung's right to use or rely on subsequently discovered information. Eunsung specifically reserves the right to supplement, amend, modify, and/or correct these responses during discovery.

INTERROGATORY NO. 2:

Separately for each of the Hydrodermabrasion Products, describe in detail the design and development of the Hydrodermabrasion Products, including by describing the design goals that motivated the design and development process, by identifying the date when the design and development work began, by providing an overview of the work done to design and develop the Hydrodermabrasion Products, by identifying and describing the role of each person involved in the design and development process, by identifying and describing the role of each business entity involved in the design and development process, by identifying and describing the role of each person involved in the design and development process, and for each of the Hydrodermabrasion Products, identify the three (3) people at Eunsung most knowledgeable about the design and development process.

RESPONSE TO INTERROGATORY NO. 2:

Eunsung restates and incorporates its General Objections as if fully set forth herein. Eunsung objects to this Interrogatory to the extent it seeks information not kept in the ordinary course of Eunsung's business. Eunsung objects to this Interrogatory as seeking information that is

not relevant to any claim or defense of any party, and is not reasonably calculated to lead to the discovery of admissible evidence. Eunsung objects to this Interrogatory as overly broad, unduly burdensome and not proportional to the needs of the Investigation to the extent that it seeks “the design goals that motivated the design and development process, by identifying the date when the design and development work began, by providing an overview of the work done to design and develop the Accused Products, by identifying and describing the role of each person involved in the design and development process, by identifying and describing the role of each business entity involved in the design and development process, by identifying and describing the role of each person involved in the design and development process.” Eunsung objects to this Interrogatory as vague, ambiguous, and inherently arbitrary to the extent it seeks information regarding “the design goals that motivated the design and development process,” “design and development work,” “the role of each person involved,” and “the role of each business entity involved.” Eunsung objects to this Interrogatory as vague, ambiguous, and inherently arbitrary to the extent it seeks “three (3) individuals at Eunsung most knowledgeable.” Eunsung objects to this Interrogatory as overly broad, unduly burdensome, and seeking information not proportional to the needs of the case, to the extent it seeks the identification of persons “most knowledgeable,” which is not information known to be kept in the ordinary course of business. Eunsung objects to this Interrogatory as compound and comprising multiple subparts that seek information about discrete subjects, and therefore constitutes multiple Interrogatories.

Subject to and without waiving the foregoing General and Specific Objections, Eunsung responds as follows:

Eunsung identifies the following individuals as having knowledge related to the Accused Products:

- In Gun Joung (Electrical Features)
- GyeongJong Jang (Mechanical Features)
- Oh Kwon Kim (Software Features)

Pursuant to FRCP 33(d), Eunsung will produce documents, to the extent responsive, non-privileged documents exist and can be found following a reasonable search, from which the answer to this Interrogatory may be derived or ascertained. As discovery in this investigation is ongoing, Eunsung specifically reserves the right to supplement, amend, modify, and/or correct these responses during discovery.

Investigation and discovery are ongoing in this case. These responses are based upon information currently available to Eunsung and are made without prejudice to Eunsung's right to use or rely on subsequently discovered information. Eunsung specifically reserves the right to supplement, amend, modify, and/or correct these responses during discovery.

INTERROGATORY NO. 3:

Separately for each of the Hydrodermabrasion Products, provide an index of the final versions of Your non-duplicative technical drawings sufficient to accurately describe the Hydrodermabrasion Products, including, for each drawing, the drawing name, drawing number, drawing author(s), date issued, revision number, and Bates numbers for drawings produced.

RESPONSE TO INTERROGATORY NO. 3:

Eunsung restates and incorporates its General Objections as if fully set forth herein. Eunsung objects to this Interrogatory to the extent it seeks information not kept in the ordinary course of Eunsung's business. Eunsung objects to this Interrogatory as seeking information that is not relevant to any claim or defense of any party, and is not reasonably calculated to lead to the discovery of admissible evidence. Eunsung objects to this Interrogatory as overly broad, unduly burdensome and not proportional to the needs of the Investigation to the extent that it seeks "an index of the final versions of Your non-duplicative technical drawings sufficient to accurately

describe the Hydrodermabrasion Products, including, for each drawing, the drawing name, drawing number, drawing author(s), date issued, revision number, and Bates numbers for drawings produced.” Eunsung objects to this Interrogatory as compound and comprising multiple subparts that seek information about discrete subjects, and therefore constitutes multiple Interrogatories. Eunsung objects to this Interrogatory as improperly attempting to shift the burden of discovery to Eunsung. Eunsung objects to this Interrogatory to the extent it seeks to require more of Eunsung than any obligation imposed by law.

Subject to and without waiving the foregoing General and Specific Objections, Eunsung responds as follows:

Pursuant to FRCP 33(d), Eunsung will produce documents, to the extent responsive, non-privileged documents exist and can be found following a reasonable search, from which the answer to this Interrogatory may be derived or ascertained. As discovery in this investigation is ongoing, Eunsung specifically reserves the right to supplement, amend, modify, and/or correct these responses during discovery.

Investigation and discovery are ongoing in this case. These responses are based upon information currently available to Eunsung and are made without prejudice to Eunsung’s right to use or rely on subsequently discovered information. Eunsung specifically reserves the right to supplement, amend, modify, and/or correct these responses during discovery.

INTERROGATORY NO. 4:

For each model number of each of the Hydrodermabrasion Products manufactured for sale in the United States, sold for importation into the United States, imported into the United States, sold in the United States, offered for sale in the United States, or used in the United States; provide all financial information relevant to sales of the Hydrodermabrasion Products and consumables for use in a hydrodermabrasion treatment performed by that Hydrodermabrasion Product, including the date the model was first offered for sale in the United States, the quantity sold in the United States in each quarter less returns, the revenue generated by U.S. sales in each quarter less returns, and the average U.S. sales price in each quarter, the itemized costs that You contend should be

deducted from the total revenue to calculate your total profits, the gross profits in each quarter less returns, and the gross profits in each quarter less returns and identify the (3) people at Eunsung most knowledgeable regarding Your response to this interrogatory.

RESPONSE TO INTERROGATORY NO. 4:

Eunsung restates and incorporates its General Objections as if fully set forth herein. Eunsung objects to this Interrogatory to the extent it seeks information not kept in the ordinary course of Eunsung's business. Eunsung objects to this Interrogatory as seeking information that is not relevant to any claim or defense of any party, and is not reasonably calculated to lead to the discovery of admissible evidence. Eunsung objects to this Interrogatory as overly broad, unduly burdensome and not proportional to the needs of the Investigation to the extent that it seeks "[f]or each model number of each of the Hydrodermabrasion Products manufactured for sale in the United States, sold for importation into the United States, imported into the United States, sold in the United States, offered for sale in the United States, or used in the United States," "all financial information relevant to sales of the Hydrodermabrasion Products and consumables for use in a hydrodermabrasion treatment performed by that Hydrodermabrasion Product, including the date the model was first offered for sale in the United States, the quantity sold in the United States in each quarter less returns, the revenue generated by U.S. sales in each quarter less returns, and the average U.S. sales price in each quarter, the itemized costs that You contend should be deducted from the total revenue to calculate your total profits, the gross profits in each quarter less returns, and the gross profits in each quarter less returns." Eunsung objects to this Interrogatory as vague, ambiguous, and inherently arbitrary to the extent it seeks information regarding "financial information relevant to sales." Eunsung objects to this Interrogatory as vague, ambiguous, and inherently arbitrary to the extent it seeks "three (3) people at Eunsung most knowledgeable." Eunsung objects to this Interrogatory as overly broad, unduly burdensome, and seeking information not proportional to the needs of the case, to the extent it seeks the identification of

persons “most knowledgeable,” which is not information known to be kept in the ordinary course of business. Eunsung objects to this Interrogatory as compound and comprising multiple subparts that seek information about discrete subjects, and therefore constitutes multiple Interrogatories. Eunsung objects to this Interrogatory as failing to provide a reasonable time period for information sought.

Subject to and without waiving the foregoing General and Specific Objections, Eunsung responds as follows:

Pursuant to FRCP 33(d), Eunsung will produce documents, to the extent responsive, non-privileged documents exist and can be found following a reasonable search, from which the answer to this Interrogatory may be derived or ascertained. As discovery in this investigation is ongoing, Eunsung specifically reserves the right to supplement, amend, modify, and/or correct these responses during discovery.

Investigation and discovery are ongoing in this case. These responses are based upon information currently available to Eunsung and are made without prejudice to Eunsung’s right to use or rely on subsequently discovered information. Eunsung specifically reserves the right to supplement, amend, modify, and/or correct these responses during discovery.

INTERROGATORY NO. 5:

Describe the circumstances relating to Your awareness of the Asserted Patents prior to the filing of the Complaint, including by identifying each person who was aware of the Asserted Patents, the circumstances under which such individuals became aware of the Asserted Patents, the date each such person became aware of the Asserted Patents, and by describing any actions taken by each such person upon becoming aware of the Asserted Patents, including any testing, analysis, or attempts to design around the Asserted Patents and identify all documents concerning such facts.

RESPONSE TO INTERROGATORY NO. 5:

Eunsung restates and incorporates its General Objections as if fully set forth herein. Eunsung objects to this Interrogatory as seeking information that is not relevant to any claim or

defense of any party, and is not reasonably calculated to lead to the discovery of admissible evidence. Eunsung objects to this Interrogatory as overly broad, unduly burdensome and not proportional to the needs of the Investigation to the extent that it seeks “the circumstances,” “each person,” “any actions taken by each such person,” “any testing, analysis, or attempts to design around,” and “all documents concerning such facts.” Eunsung objects to this Interrogatory as compound and comprising multiple subparts that seek information about discrete subjects, and therefore constitutes multiple Interrogatories. Eunsung objects to this Interrogatory to the extent it calls for a legal conclusion. Eunsung further object to this Interrogatory to the extent that it seeks information or documents protected by the attorney-client privilege, work product doctrine or immunity, joint defense privilege, common interest doctrine and/or similar privilege, including information or documents prepared in anticipation of litigation or for trial.

Subject to and without waiving the foregoing General and Specific Objections, Eunsung responds as follows:

Eunsung first became aware of the '287 patent on June 3, 2024, when Eunsung received a notice of infringement letter from HydraFacial dated May 29, 2024. Eunsung first became aware of the '052 patent around July 2022.

Eunsung first became aware of the '607, '477, '641, and '642 patent when HydraFacial filed the Complaint in this case.

Investigation and discovery are ongoing in this case. These responses are based upon information currently available to Eunsung and are made without prejudice to Eunsung's right to use or rely on subsequently discovered information. Eunsung specifically reserves the right to supplement, amend, modify, and/or correct these responses during discovery.

INTERROGATORY NO. 6:

Describe the circumstances relating to Your awareness prior to the filing of the Complaint in this Litigation of (1) HydraFacial, (2) the HydraFacial Tower, (3) the HydraFacial Elite, (4) the HydraFacial Allegro, (5) the HydraFacial Syndeo, and (6) the hydrodermabrasion tips for use with the HydraFacial systems prior to the filing of the Complaint, including by identifying each person who was aware of the identified subject, the circumstances under which such individuals became aware of the identified subject and by describing any actions taken by each such person upon becoming aware of the identified subject, including any research, testing, or analysis related to the identified subject and identify all documents concerning such facts.

RESPONSE TO INTERROGATORY NO. 6:

Eunsung restates and incorporates its General Objections as if fully set forth herein. Eunsung objects to this Interrogatory to the extent it seeks information not kept in the ordinary course of Eunsung's business. Eunsung objects to this Interrogatory as seeking information that is not relevant to any claim or defense of any party, and is not reasonably calculated to lead to the discovery of admissible evidence. Eunsung objects to this Interrogatory as overly broad, unduly burdensome and not proportional to the needs of the Investigation to the extent that it seeks "each person who was aware," "the circumstances," "any actions taken by each such person," "any research, testing, or analysis related to the identified subject," and "all documents concerning such facts." Eunsung objects to this Interrogatory as compound and comprising multiple subparts that seek information about discrete subjects, and therefore constitutes multiple Interrogatories. Eunsung objects to this Interrogatory to the extent it calls for a legal conclusion. Eunsung furthers object to this Interrogatory to the extent that it seeks information or documents protected by the attorney-client privilege, work product doctrine or immunity, joint defense privilege, common interest doctrine and/or similar privilege, including information or documents prepared in anticipation of litigation or for trial.

Subject to and without waiving the foregoing General and Specific Objections, Eunsung responds as follows:

Eunsung was aware of HydraFacial's predecessor, Edge Systems prior to the filing of the Complaint. Eunsung was aware of Edge Systems as early as March of 2014. Eunsung was not aware of the HydraFacial Tower, the HydraFacial Elite, the HydraFacial Allegro, and the HydraFacial Syndeo until the after the filing of the Complaint.

Investigation and discovery are ongoing in this case. These responses are based upon information currently available to Eunsung and are made without prejudice to Eunsung's right to use or rely on subsequently discovered information. Eunsung specifically reserves the right to supplement, amend, modify, and/or correct these responses during discovery.

INTERROGATORY NO. 7:

Identify and describe all testing, evaluation, analysis, or examination of any non-Eunsung product, component, or part involved in hydrodermabrasion functionality or involved in treating the skin of an individual through mechanical and/or fluid-based abrasion or exfoliation by Eunsung or on Eunsung's behalf, including, without limitation:

- (a) the name and model number of the product, component, or part;
- (b) the current location of the product, component, or part;
- (c) the date and manner in which the product, component, or part was acquired;
- (d) the identity of all persons who obtained or handled the product, component, or part;
- (e) the identity of all persons who participated in the testing, evaluation, analysis or examination of the product, component, or part;
- (f) each process step used in the testing, evaluation, analysis, or examination of the product, component, or part;
- (g) all written or oral reports, observations, or conclusions that were the result of such testing, evaluation, analysis, or examination;
- (h) every document relating to such testing, evaluation, analysis, or examination;
- (i) the persons most knowledgeable about Communications between Eunsung and each third party that performed testing, evaluation, analysis, or examination of the product, component, or part; and
- (j) any other circumstances not yet provided in response to this Interrogatory that pertain to the testing, evaluation, analysis, or examination of any third party product, component, or part involved in hydrodermabrasion functionality or involved in treating the skin of an individual through mechanical and/or fluid-based abrasion or exfoliation, as well as all documents reviewed or created that relate to such testing, evaluation, analysis, or examination

RESPONSE TO INTERROGATORY NO. 7:

Eunsung restates and incorporates its General Objections as if fully set forth herein. Eunsung objects to this Interrogatory to the extent it seeks information not kept in the ordinary course of Eunsung's business. Eunsung objects to this Interrogatory as seeking information that is not relevant to any claim or defense of any party, and is not reasonably calculated to lead to the discovery of admissible evidence. Eunsung objects to this Interrogatory as overly broad, unduly burdensome and not proportional to the needs of the Investigation to the extent that it seeks "all testing, evaluation, analysis, or examination of any non-Eunsung product, component, or part involved in Hydrodermabrasion functionality or involved in treating the skin of an individual through mechanical and/or fluid-based abrasion or exfoliation by Eunsung or on Eunsung's behalf," "name and model number of the product, component, or part," "current location of the product, component, or part," "date and manner in which the product, component, or part was acquired," "identity of all persons who obtained or handled the product, component, or part," "identity of all persons who participated in the testing, evaluation, analysis or examination of the product, component, or part," "each process step used in the testing, evaluation, analysis, or examination of the product, component, or part," "all written or oral reports, observations, or conclusions that were the result of such testing, evaluation, analysis, or examination," "the persons most knowledgeable about Communications between Eunsung and each third party that performed testing, evaluation, analysis, or examination of the product, component, or part," and "any other circumstances not yet provided in response to this Interrogatory that pertain to the testing, evaluation, analysis, or examination of any third party product, component, or part involved in hydrodermabrasion functionality or involved in treating the skin of an individual through mechanical and/or fluid-based abrasion or exfoliation, as well as all documents reviewed or created that relate to such testing, evaluation, analysis, or examination." Eunsung objects to this

Interrogatory as vague, ambiguous, and inherently arbitrary to the extent it seeks information regarding “evaluation,” “involved in,” and “participated in,” “used in,” “relating to.” Eunsung objects to this Interrogatory as overly broad, unduly burdensome, and seeking information not proportional to the needs of the case, to the extent it seeks the identification of persons “most knowledgeable,” which is not information known to be kept in the ordinary course of business. Eunsung objects to this Interrogatory as compound and comprising multiple subparts that seek information about discrete subjects, and therefore constitutes multiple Interrogatories. Eunsung objects to this Interrogatory to the extent it calls for a legal conclusion. Eunsung further object to this Interrogatory to the extent that it seeks information or documents protected by the attorney-client privilege, work product doctrine or immunity, joint defense privilege, common interest doctrine and/or similar privilege, including information or documents prepared in anticipation of litigation or for trial.

Subject to and without waiving the foregoing General and Specific Objections, Eunsung responds as follows:

Eunsung does not conduct any testing on non-Eunsung products.

Investigation and discovery are ongoing in this case. These responses are based upon information currently available to Eunsung and are made without prejudice to Eunsung’s right to use or rely on subsequently discovered information. Eunsung specifically reserves the right to supplement, amend, modify, and/or correct these responses during discovery.

INTERROGATORY NO. 8:

For each of the following parties, describe your relationship and any contracts between you and said party:

- (a) Cartessa;
- (b) Luvo;
- (c) Clarion;

(d) MRP.

RESPONSE TO INTERROGATORY NO. 8:

Eunsung restates and incorporates its General Objections as if fully set forth herein. Eunsung objects to this Interrogatory to the extent it seeks information not kept in the ordinary course of Eunsung's business. Eunsung objects to this Interrogatory as seeking information that is not relevant to any claim or defense of any party, and is not reasonably calculated to lead to the discovery of admissible evidence. Eunsung objects to this Interrogatory as overly broad, unduly burdensome and not proportional to the needs of the Investigation to the extent that it seeks "relationship and any contracts." Eunsung objects to this Interrogatory as vague, ambiguous, and inherently arbitrary to the extent it seeks information regarding "relationship[s]." Eunsung objects to this Interrogatory as compound and comprising multiple subparts that seek information about discrete subjects, and therefore constitutes multiple Interrogatories. Eunsung objects to this Interrogatory to the extent it calls for a legal conclusion. Eunsung further object to this Interrogatory to the extent that it seeks information or documents protected by the attorney-client privilege, work product doctrine or immunity, joint defense privilege, common interest doctrine and/or similar privilege, including information or documents prepared in anticipation of litigation or for trial.

Subject to and without waiving the foregoing General and Specific Objections, Eunsung responds as follows:

Pursuant to FRCP 33(d), Eunsung will produce documents, to the extent responsive, non-privileged documents exist and can be found following a reasonable search, from which the answer to this Interrogatory may be derived or ascertained.

Investigation and discovery are ongoing in this case. These responses are based upon information currently available to Eunsung and are made without prejudice to Eunsung's right to

use or rely on subsequently discovered information. Eunsung specifically reserves the right to supplement, amend, modify, and/or correct these responses during discovery.

INTERROGATORY NO. 9:

Identify each product which You contend is an acceptable non-infringing alternative for:

- (a) the HydraFacial Syndeo® hydrodermabrasion system;
- (b) the hydrodermabrasion handpiece for use with the HydraFacial Syndeo®; and
- (c) the hydrodermabrasion tips for use with the HydraFacial Syndeo®.

RESPONSE TO INTERROGATORY NO. 9:

Eunsung restates and incorporates its General Objections as if fully set forth herein. Eunsung objects to this Interrogatory to the extent it seeks information not kept in the ordinary course of Eunsung's business. Eunsung objects to this Interrogatory as seeking information that is not relevant to any claim or defense of any party, and is not reasonably calculated to lead to the discovery of admissible evidence. Eunsung objects to this Interrogatory as calling for a legal conclusion. Eunsung objects to this Interrogatory as calling for premature expert testimony in advance of the deadlines set in the Scheduling Order. Eunsung objects to this Interrogatory as vague and ambiguous to the extent it seeks information regarding "non-infringing alternative[s]" for products. Eunsung is not aware of any law regarding infringement of a product, or non-infringement of a product. Eunsung objects to this Interrogatory as compound and comprising multiple subparts that seek information about discrete subjects, and therefore constitutes multiple Interrogatories. Eunsung objects to this Interrogatory to the extent it calls for a legal conclusion. Eunsung furthers object to this Interrogatory to the extent that it seeks information or documents protected by the attorney-client privilege, work product doctrine or immunity, joint defense privilege, common interest doctrine and/or similar privilege, including information or documents prepared in anticipation of litigation or for trial.

Subject to and without waiving the foregoing General and Specific Objections, Eunsung responds as follows:

Eunsung will respond to this Interrogatory pursuant to the Procedural Schedule in this case. These responses are based upon information currently available to Eunsung and are made without prejudice to Eunsung's right to use or rely on subsequently discovered information. Eunsung specifically reserves the right to supplement, amend, modify, and/or correct these responses during discovery.

Dated: June 18, 2025

Respectfully submitted,

/s/ Adam M. Pace

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Appendix A

Code	Product Description
ESK-2253HH-1	Hydra Touch H2
ESK-2253HH-9	Hydra Touch H2 Cart
CD-AS1-050	Aqua Clean Solution (Premium) S1
CD-AS2-050	Aqua Clean Solution (Premium) S2
CD-AS3-050	Aqua Clean Solution (Premium) S3
P 2225-A9900412	Flow Valve Assembly
P ES2063	D/S Diamon Tip Dust Net
P ES2324-01	AQUA HEAD TIP-C New
P ES2586-02	Aqua Clean Radial Tip Small Package
P 2225-PFT00501	Dust Filter DF-F6F6-200
2225-SHP00005	Aqua Handpiece Assembly Rev 200
P 2225-P0100418-02	Aqua Handpiece Holder Flame Resistant
P 2225-P0202001-A	Solution Empty Bottle S-1 Line Mark
P 2225-P0202002-A	Solution Empty Bottle S-2 Line Mark
P 2225-P0202003-A	Solution Empty Bottle S-3 Line Mark
A 2201-A9900406	Aqua Clean Drain Tank Assembly
P 2253-P0201419-05	Hydra Care H2 S Front Rev 300
A 2253-A0100427	Hydra Care H2 Cosmetic Cap Assembly
A 2253-S9900435	Hydra Care H2 LCD PCB Assembly
P 2253-P0201419-07	Skin Wave S Front Rev 300
P 2225-P9901418-01	Valve Handle Silver Glossy Deposition Flame Resistant
P 2253-P0112420-02	Aqua Clean H2 Front Acrylic Transparent 2T
P 장비 0968	US AC Cord
2253-A9900201	Hydra Care H2 Y HP Assembly
HB-02	Hydra Beauty Electro HP Assembly
P 2201-P0100600-01	AQUA CLEAN MINI COSMETIC CAP FITTING NUT
P 2225-P0200413-02	FLOW VALVE BODY 50RVS
P 2225-P0200414-01	FLOW VALVE SHAFT (Old Version)

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Appendix A

Code	Product Description
P 2225-P0200416	Valve Plate
P 2225-P1000417	Valve Viton
P 2225-PFT00450	FITTING WMM 06
P 2225-PFT00451	FITTING WLJ 06
P 2249-PFT00405	FITTING AEU 0606M
P 2253-A9900427	Hydra Care H2 Hydrogen Machine Assembly
P 2253-PFT00403	FITTING AUC 1006M
P 2281-P0007495	M_COSMETIC CAP
2253-A9900602	SKIN WAVE Acrylic Wagon
6-041	Aqua Clean Solution S1
6-042	Aqua Clean Solution S2
6-043	Aqua Clean Solution S3
P ES2587-02	Aqua Clean Radial Tip Large Package (아쿠아클린 방사형 팁 Large 포장)
P 1702-P9900403	H-SHINE HYDROGEN MACHINE
P 2253-E9900435-02	HYDRA CARE H2 HYDROGEN PCB ASS'Y
P 2253-E9900447-02	HYDRA CARE H2 LCD PCB ASS'Y REV200
P 2253-P0800432	AQUA CLEAN H2 HYDROGEN PARTITION
P 2253-P0801430-01	HYDRA CARE H2 2_HYDROGEN CASE TOP Flame Resistant (HYDRA CARE H2 2_HYDROGEN CASE TOP 난연)
P 2253-P0801434-02	HYDRA CARE H2 S_HYDROGEN CASE BOTTOM(M8)
P 2253-P1100431	AQUA CLEAN H2 HYDROGEN PACKING
P 2253-P9900447	HYDRA CARE H2 Connector
P 2432-E9999001-02	HYDRA BEAUTY NEW_7" LCD With Touch (height adjusted)
P 2249-PFT00401	FITTING AMC 0602M
P 2249-PFT00402	FITTING AME 0602M
P 2249-PFT00403	FITTING AME 0604M

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Appendix A

Code	Product Description
P 2249-PFT00404	FITTING APL 06M
P 2249-PSV00401-02	SOL VALVE MODULE Bolt Fastening Hole 6.5 Diameter (SOL VALVE MOUDLE 볼트체결 홀 6.5 파이)
P 2253-E9900516-02	HYDRA CARE H2 MAIN PCB ASS'Y
P 2253-PFT00404	FITTING ACHV0606M
P ES1844	Silencer SM-01(소음기 SM-01)
A 2201-A9900410	Aqua Clean Sol VALVE Ass'y
A 2249-A9900447	HYDRA BEAUTY NEW WATER VALVE ASS'Y
A 2249-A9900448	HYDRA BEAUTY NEW AIR VALVE ASS'Y
P 2225-P9901418	Valve Handle – Silver Glossy Coating (Valve Handle Silver 유광 증착)
P 2253-P0800428	AQUA CLEAN H2 HYDROGEN BOTTLE
P 소모품 0883	O-Ring for Waste Water Tank (폐수통 O-Ring)
P 2225-P0202001-A	Empty Solution Bottle S-1 with Line Marking (솔루션 공병 S-1 라인표시)
P 2225-P0202002-A	Empty Solution Bottle S-2 with Line Marking (솔루션 공병 S-2 라인표시)
P 2225-P0202003-A	Empty Solution Bottle S-3 with Line Marking (솔루션 공병 S-3 라인표시)
P 2253-P1500001-02	HYDRA CARE H2 AUDIO JACK
P 기타 0001	SAMPLE (Shared Use)
P 2239-E1203020	AQUA SENSOR PCB 1
P 2239-E1203021	AQUA SENSOR PCB 2
P 2253-E9900519-01	AQUA CLEAN H2 SOL PCB ASS'Y
A 2212-A9900413	HYDRA BEAUTY LEVEL SOL ASS'Y

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Appendix A

Code	Product Description
P ES1363	Medical White Wheel with Brake and Bolt 65 for Magicpot (매직팟용 바퀴 메디컬 화이트 브레이크 볼트 65)
P 기타 0002	O-Ring (Shared Use) (오링 품목(공통))
A 2253-A9900406	HYDRA CARE H2 BACK COVER ASS'Y
P 2225-P9900003-01	PUMP 50RVS 115V
P 2253-P0801478-01	HYDRA CARE H2 SOL BRACKET(B)
P 2253-P0800428-02	HYDRA CARE H2 HYDROGEN BOTTLE REV 102
P 2225-A9900412	Flow Valve Ass'y
P ES2312	Body Twin Tube Acetal
ESK-2275BL-10	BELA MD Acrlic Wagon
ESK-2281HD-10	BELA MD PLUS CART
2275-A9900201	BELA MD AQUA HANDPIECE ASS'Y
2281-A9900201	NEW BELA MD SCRAPER ASSY
P 2275-P0600209	BELA MD CABLE CONNECTOR MOLDING
P 2225-P0106401	HYDRA TOUCH H2 VALVE HANDLE
P 2253-E9900435-01	HYDRA CARE H2 HYDROGEN PCB ASS'Y
P 2253-E9900447-01	HYDRA CARE H2 LCD PCB ASS'Y
P 소모품 0885	HYDRA TOUCH H2 TUBE
P 2275-P0600208	BELA MD CABLE ASS'Y
P 2253-E9900516	HYDRA CARE H2 MAIN PCB ASS'Y
P 2253-E9900447	HYDRA CARE H2 LCD PCB ASS'Y
P 2253-P0200419-07	HYDRA TOUCH H2 P-BELA MD LUV0 Printed (HYDRA TOUCH H2 P-BELA MD LUV0 인쇄)
P 2281-E1200412	NEW BELA MD LINE FILTER PCB ASS'Y
P 2281-P0013486	MD BELA 2.0 EP_VALVE HANDLE

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Appendix A

Code	Product Description
P ES2586-04	Aqua Clean Radial Tip Small Package (for BELA MD) (아쿠아클린 방사형 팁 SMALL 포장 (BELA MD)용)
P 2281-E1200410-B	NEW BELA MD POWER PCB ASS'Y
P 2281-E1200415	NEW BELA MD USB PCB ASS'Y
P 2281-EWR00425-01	NEW BELA MD SPEAKER HARNESS
P 2281-EWR00430-01	NEW BELA MD AUDIO JACK CABLE HARNESS
P 2281-EWR00437	NEW BELA MD FAN HARNESS
P 2281-EWR00438	NEW BELA MD EP_CIRCLE CONNECTOR HARNESS
P 2281-EWR00439-01	NEW BELA MD Y ROLL-CIRCLE CON HARNESS
P 2281-EWR00440	NEW BELA MD SCB-CIRCLE CONNECTOR HARNESS
P 2281-EWR00441-01	NEW BELA MD DRL-CIRCLE CONNECTOR HARNESS
P 2281-P0001455-01	NEW BELA MD S_TOP CASE
P 2281-P0002446-01	NEW BELA MD P_FORNT CASE+ Printed (NEW BELA MD P_FORNT CASE+ 인쇄)
P 2281-P0200406	NEW BELA MD HP HOLDER (3 Types)
P 2281-E1200408-A	NEW BELA MD MAIN PCB ASS'Y
P 2253-P0801412-10	HYDRA TOUCH H2 VALVE BRACKET (CLARION)
P 2253-P1500002-01	HYDRA CARE H2 AUDIO JACK Harness
P 장비 0703	Bela MD Y Handpiece Connector
P 장비 0704	Bela MD EP Handpiece Connector
P 2275-P0600208-01	BELA MD CABLE ASS'Y (Silver zipper bag packaging) (BELA MD CABLE ASS'Y (은색 지퍼백 포장))
P ES2587-04	Aqua Clean Radial Tip Large Package (for BELA MD) (아쿠아클린 방사형 팁 LARGE 포장 (BELA MD)용)

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Appendix A

Code	Product Description
P 2275-P0600211	BELA MD TUBE JOINT
P 2281-P0801408-02	NEW BELA MD BACK COVER REV200
A 2281-A9900411	NEW BELA MD SOLUTION SOL VALVE ASS'Y
A 2281-A9900407	NEW BELA MD BACK COVER ASS'Y
P 2281-A9900402	NEW BELA MD FRAME ASS'Y
P 2253-P0801403-20	HYDRA TOUCH H2 FRAME (CLARION)
P 2253-P0800428-01	HYDRA CARE H2 HYDROGEN BOTTLE REV 101
A 2281-A0200470	BELA MD 2.0 DRAIN TANK ASS'Y
A 2281-SAS00601	BELA MD PM KIT
P 2281-E1200408	NEW BELA MD MAIN PCB ASS'Y
A 2253-A9900424	HYDRA CARE H2 SOLUTION SOL VALVE ASS'Y
P 2253-P0001499-02	HYDRA CARE H2 DRAIN TANK PLATE Coating
P 2281-P0801403-04	NEW BELA MD FRAME REV103
A 2253-S9900458	HYDRA TOUCH H2 DRAIN TANK CON ASS'Y
A 2275-P0104404	BELA MD HANDLE
P 2275-P9900403	BELA MD LCD COVER (Insulation Pad)